

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE

In Re:  TRIKEENAN TILEWORKS INC.  Debtor.	Chapter 11 Case No. 10-13725-JMD
In Re:  TRIKEENAN HOLDINGS INC.	Chapter 11 Case No. 10-13726-JMD
In Re:  TRIKEENAN TILEWORKS INC. OF NEWYORK  Debtor	Chapter 11 Case No. 10-13727-JMD  Jointly administered through Case No. 10-13725-JMD

**ASSENTED MOTION FOR ORDER PURSUANT TO RULE 1007(a)(5) AND (c) OF  
THE**

**FEDERAL RULES OF BANKRUPTCY PROCEDURE, EXTENDING TIME  
FOR FILING SCHEDULES AND STATEMENTS OF FINANCIAL AFFAIRS**

Now Come the debtors, Trikeenan Tileworks Inc, Trikeenan Holdings Inc and Trikeenan Tileworks Inc of New York, the debtors and debtors in possession in the above-captioned chapter 11 cases (“Debtors”), through counsel, and request an order extending the Debtor’s time for filing the schedules and statements of financial affairs required by Fed. R. Bankr. P.1007(b) (the “Motion”). In further support, the Debtor respectfully represents as follows:

**STATUS OF THE CASE AND JURISDICTION**

1. On August 30, 2010, each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”). Debtors

continue to operate as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. To date no trustees, examiners or creditors' committees have been appointed.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

**RELIEF REQUESTED**

3. The voluntary chapter 11 petition filed by the Debtors were accompanied by a list of the twenty (20) largest creditors for each Debtor. The schedules of assets and liabilities, current income and expenditures, statements of financial affairs, lists of equity security holders, and lists of executory contracts and leases required by Fed. R. Bankr. P. 1007(b) (collectively, the "Schedules") were not filed with the Debtors' chapter 11 petitions.

4. Pursuant to notices issued by this Court, the Debtor's schedules are currently due on or before September 13, 2010. The Debtor requires additional time to collect the data needed for the accurate preparation and filing of the Schedules. At this juncture, the Debtor estimates that an extension of an additional fourteen (14) days beyond the fifteen (15) day extension provided by Fed. R. Bankr. P. 1007(c), up to and including September 28, 2010, will provide it with sufficient time to prepare and file the Schedules. Accordingly, the Debtor requests such extension without prejudice to its rights to seek any further extension(s) from this Court, if necessary.

5. The meeting of creditors pursuant to Section 341 of the Bankruptcy Code (the "341 Meeting") has been scheduled for October 1, 2010. The Debtor respectfully submits that submission of the Schedules on September 28, 2010 will provide the United States Trustee's Office (the "UST") and other interested parties ample time to review the Schedules in

preparation for the 341 Meeting. Accordingly, no party will be unfairly prejudiced by the relief sought hereby.

6. The Debtor consulted with the UST prior to filing this motion and that office has consented to the relief requested herein.

**NOTICE**

7. Notice of this Motion has been given to (i) the United States Trustee; (ii) the Debtor's secured creditors; and (iii) the Debtor's twenty largest unsecured creditors. The Debtor submits that, in light of the nature of the relief requested, no further notice is required.

**NO PREVIOUS RELIEF REQUESTED**

8. The Debtor has not previously sought the relief requested herein from this Court or any other court.

WHEREFORE, the Debtor requests an extension of time to file the Schedules up to and including September 28, 2010, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Trikeenan Tileworks, Inc.  
Trikeenan Holdings Inc.  
Trikeenan Tileworks inc. of New York

By their Attorneys,

BERNSTEIN, SHUR, SAWYER & NELSON, P.A.

Date: 9 September 2010

By: /s/Jennifer Rood  
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